

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)
Plaintiff,) C.A. No. 16-122-LPS
v.) **JURY TRIAL DEMANDED**
GROUPON, INC.)) **PUBLIC VERSION**
Defendant.)

**DECLARATION OF KEITH A. WALKER IN SUPPORT OF IBM'S MOTION TO
EXCLUDE OCEAN TOMO'S EMPLOYEES FROM ACCESSING CONFIDENTIAL
INFORMATION UNDER THE PROTECTIVE ORDER**

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